

ProCom LMR, Inc

P. O. Box 486
Haysville, KS 67060

Received & Indexed

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February 26, 2009

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
9300 East Hampton Drive
Capitol Heights, MD 20743

RE: EB Docket No. 06-36
Annual CPNI Certification for Year 2009

Dear Ms. Dortch:

In accordance with Public Notice DA 09-240 issued on February 13, 2009, attached is the annual CPNI certification filing for the year of 2008 for ProCom LMR, Inc.

Sincerely,


Alan D. Haworth
President

Attachment

cc: Federal Communications Commission (two copies)
Enforcement Bureau
Telecommunications Consumers Division
455 12th Street, SW, Suite TW-A325
Washington, DC 20554

Best Copy and Printing, Inc. (one copy)
455 12th Street, Suite CY-B402
Washington, DC 20554

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Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008 EB Docket 06-36

Date filed: 2/26/09

Name of company(s) covered by this certification: ProCom LMR, Inc.

Form 499 Filer ID: 826994

Name of signatory: Alan D. Haworth

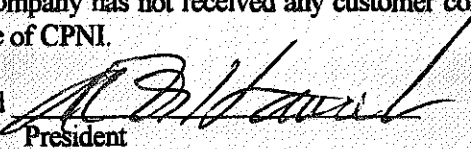
Title of signatory: President

I, Alan D. Haworth, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed 
Title: President
Date: 2/26/2009

Company Policy for Customer Proprietary Network Information

PMRS License WPJY681

CPNI Policy

1. Customer proprietary network information of ProCom LMR, Inc. customers using services or products related to the PMRS license WPJY681 or frequencies licensed by ProCom LMR, Inc. can not be released, transmitted in written or electronic form, or discussed over the telephone without the authenticated permission of the customer's designated contact.

The designated contact will be the customer himself or herself in the case of an individual or the person establishing service with ProCom LMR, Inc. in the case of a company or organization.

It is ProCom LMR, Inc. policy to discuss or release customer CPNI information only to the designated contact of the customer.

The only company officer or employee authorized to discuss or release customer proprietary network information is Alan D. Haworth, (President).

- *Carrier has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.*

- *Prohibit carriers from releasing call detail information to customers during customer-initiated telephone contact except when the customer provides a password;*

2. Permission discuss or release information must come from the designated contact in one of the following forms:
 - a. Providing a written request on company letterhead with original signature of designated contact.
 - b. In telephone conversations, confirmation of the designated contact's identity must confirmed by the customer providing the correct password listed in the CPNI customer information database maintained by ProCom LMR, Inc. and correct billing address information in the accounts receivable database for the customer in question.
 - c. Designated contact may authorize release of information in person at the ProCom LMR, Inc. business office at 501 W. Grand Ave. after showing a government issued photo ID.

- *Carrier continually educates and trains its employees regarding the appropriate use of CPNI. Carrier has established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.*

3. All employees of ProCom LMR, Inc. must read this policy annually and note having read the policy in the CPNI FCC Compliance Handbook maintained by ProCom LMR, Inc.
Disciplinary procedure:
 - a. Any employee or officer of ProCom LMR, Inc. who fails to enforce or follow CPNI company policy will review the company policy with another company officer and a written note made of the violations and retraining placed in employee personnel records.
 - b. Note of violation will be retained for inclusion in annual report to the FCC.

• *Carrier maintains a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. Carrier also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.*

4. ProCom LMR, Inc. does not use customer's CPNI in sales or marketing campaigns nor does it disclose customer CPNI to third parties unless required to do so by law.

• *Carrier has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, Carrier's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.*

5. ProCom LMR, Inc. has designated Alan D. Haworth (President) to review all use of customer CPNI.

• *Establish a notification process for both law enforcement and customers in the event of a CPNI breach.*

6. If it is determined that a breach of confidentiality has occurred for CPNI, ProCom LMR, Inc. will notify all affected and potentially affected customers with by letter explaining the circumstances and type of information lost, to the current designated contact at contact's address of record.

ProCom LMR, Inc. will notify the City of Haysville, Kansas Police Department of the breach by a certified letter explaining the circumstances and type of information lost with a list of customers notified by letter.

• *Require carriers to notify customers immediately when a password is lost or forgotten and an on-line account or an address of record is created or changed.*

7. If customer CPNI password(s) or address of record are lost from the ProCom LMR, Inc. database, customers will be contacted will be made by letter or telephone to notify customer that information has been lost and account information needs to be recreated.

ProCom LMR, Inc. does not provide online account information.

Revised 2/26/2009

End